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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:	Chapter 11
NEW ENGLAND MOTOR FREIGHT, INC., <i>et al.</i> , <sup>1</sup>	Case No. 19-12809 (JKS)
Debtors.	(Jointly Administered)
KEVIN P. CLANCY, solely in his capacity as the LIQUIDATING TRUSTEE,	
Plaintiff,	
v.	Adv. Proc. No. 21-01100 (JKS)
SHIPLEY FUELS MARKETING, LLC,	
Defendant.	

**STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT**

Kevin P. Clancy, solely in his capacity as the liquidating trustee (the “Plaintiff”), and Shipley Fuels Marketing, LLC (“Defendant” and, together with Plaintiff, the “Parties”), through

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<sup>1</sup> The Debtors in these Chapter 11 Cases and the last four digits of each Debtor’s taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

their respective counsel, enter into this Stipulation to Extend Time to Respond to Complaint and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which Defendant may answer, move, or otherwise plead to the Complaint [Adv. D.I. 1] is hereby extended through and including April 14, 2021.

2. Defendant admits that Defendant is the proper party defendant as named in the Summons and Complaint.

3. In exchange for Plaintiff's agreement to extend the response deadline, Defendant agrees to waive any issues relating to service of process of the Summons and Complaint.

Dated: March 11, 2021

**AGREED TO BY:**

**ARMSTRONG TEASDALE LLP**

/s/ Ashley E. Shapiro

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